

The Honorable James Robart

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

DWIGHT HOLLAND,

Plaintiff,

v.

KING COUNTY ADULT
DETENTION, KING COUNTY et al.,
KING COUNTY DISTRICT COURT
EAST DIVISION-Redmond Courthouse
et al., WASHINGTON STATE
DEPARTMENT OF LICENSING, et al.,
WASHINGTON STATE PATROL et al,
OFFICER WSP ANTHONY BROCK in
his individual and official capacity as
Washington State Patrol officer,
LAKEYSHA NICOLE WASHINGTON
in her individual and official capacity as
Prosecuting attorney, KING COUNTY
PROSECUTING ATTORNEY'S
OFFICE et al., GARY WESTSIDE
TOWING LLC,

Defendants.

NO. 12-cv-0791 JLR

DECLARATION OF
TOBIN E. DALE IN SUPPORT OF
STATE DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
MOTION TO COMPEL

TOBIN E. DALE hereby declares:

1. I am the Assistant Attorney General responsible for defending the Washington State Department of Licensing, Washington State Patrol, and Washington State Trooper Anthony Brock ("State Defendants" or "defendants") in this matter. I am over the age of eighteen years,

1 not a party to the above-captioned action, and am competent to testify to the matters set forth in
2 this Declaration.

3 2. This Declaration is based upon my personal knowledge in my capacity as counsel for
4 the defendants.

5 3. Pro se plaintiff Mr. Holland did not hold a meet-and-confer conference with the State
6 Defendants by telephone or in-person regarding the matters which are the subject of his instant
7 motion to compel.

8 I declare under penalty of perjury of the laws of the State of Washington and the United
9 States that the foregoing is true and correct.

10 DATED this 28th day of June, 2013.

11
12 
13 TOBIN E. DALE

CERTIFICATION OF SERVICE

I hereby certify that on this 1st day of July, 2013, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

Samantha Kenner: Samantha.kanner@kingcounty.gov

Dwight Holland: dmanh3@comcast.net

/s/ Tobin Dale

TOBIN DALE, WSBA No. 29595

Assistant Attorney General

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